

ORIGINAL

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District of Hawaii

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

OCT 20 2022
at 7 o'clock and 15 min. P M an
John A. Mannie, Clerk

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 22-00031 DKW
)	
Plaintiff,)	SUPERSEDING INDICTMENT
)	
v.)	[18 U.S.C. § 875(c)]
)	
LINDSEY KINNEY,)	
aka "Cowboy,")	
)	
Defendant.)	
)	

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1
Interstate Threat to Injure
(18 U.S.C. § 875(c))

On or about January 17, 2022, within the District of Hawaii and elsewhere, LINDSEY KINNEY, aka “Cowboy,” the defendant, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure Victim 1, Victim 2, and Victim 3, namely a post on Instagram threatening to kill the victims by beheading.

All in violation of Title 18, United States Code, Section 875(c).

Count 2
Interstate Threat to Injure
(18 U.S.C. § 875(c))

On or about March 28, 2022, within the District of Hawaii and elsewhere, LINDSEY KINNEY, aka “Cowboy,” the defendant, knowingly and willfully transmitted in interstate and foreign commerce a communication containing a threat to injure Victim 4, Victim 4’s security staff, and Victim 5, namely a post on Instagram threatening to injure and kill the victims by beheading and other means.

All in violation of Title 18, United States Code, Section 875(c).

DATED: October 20, 2022, at Honolulu, Hawaii.

A TRUE BILL

/s/ Foreperson

FOREPERSON, GRAND JURY


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United States v. Lindsey Kinney
Superseding Indictment
Cr. No. 22-00031 DKW